



FARBER  
SCHNEIDER  
FERRARI  
LLP

261 Madison Avenue, 26<sup>th</sup> Floor  
New York, New York 10016  
(212) 972-7040 (o) • (212) 922-1939 (f)  
[www.FSFLLP.com](http://www.FSFLLP.com)

**ROBERT B. LOWER, COUNSEL**  
**RLOWER@FSFLLP.COM**

December 23, 2023

**Via ECF**

Hon. Vera M. Scanlon, U.S.D.J.  
United States District Court, E.D.N.Y.

**Re: Opp'n to Pls.' Dec. 22, 2023 Motion to Extend Discovery, Depose Erik Stiene  
Case No. 1:22-cv-05686-KAM-VMS — *Justin Lanasa et al. v. Erik Stiene et al.***

Dear Judge Scanlon:

The prejudice to Defendants entails an already-six-figure defense of Plaintiffs' patently meritless, vexatious, and pathological claims and conduct, which would be exacerbated by a >1-month extension of Plaintiffs' harassing and futile fishing expedition for a claim upon which relief could be granted. This was corroborated by Mr. Lanasa on Thursday, when he acknowledged, *inter alia*, mailing feces to Mr. Stiene's residence,<sup>1</sup> wrongfully withholding formally requested evidence related to his own claims, and naming Mr. Stiene's mother as a Defendant despite having zero interaction with her ever. Conversely, Defendants, who were accused of no actionable conduct in either Complaint, have exercised extraordinary restraint by not yet bringing counterclaims. In sum, Plaintiffs have sought leave to prolong the costs & fees-warranting circus described in, *e.g.*, our Fed. R. Civ. P. 11 & 12(b) papers, which we rest on, and do not believe require any discovery to resolve with prejudice, costs, and fees.

Respectfully submitted,

FARBER SCHNEIDER FERRARI LLP

By:   
Robert B. Lower

cc: Counsel of record; Hon. Kiyo A. Matsumoto, U.S.M.J. (via ECF)

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<sup>1</sup> Specifically, via poopsenders.com, an aptly named outfit specializing in this jejune predilection (last accessed Dec. 23, 2023) (cf. ECF No. 48 at 2, Pls.' false Oct. 25, 2023 representation to Your Honor that Defs. "entirely fabricated" the "absurd and unsupported" allegation "that Mr. LaNasa had mailed feces to Defendant Stiene").